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July 20, 2012

Hon. Michael A. Hammer, U.S.M.J.
United States District Court
District of New Jersey
M.L. King Jr. Federal Building & Courthouse
4th Floor
50 Walnut Street
Newark, NJ 07102

Re: Moulton v. LG Electronics USA, Inc.
Civil Action No. 11-cv-4073

Dear Judge Hammer:

We are counsel to Defendants LG Electronics, Inc. and LG Electronics USA, Inc. ("Defendants") in the above-captioned matter. We submit this letter on behalf of all parties in response to Your Honor's order dated May 11, 2012 setting an initial conference date for August 8, 2012.

Defendant LG Electronics USA, Inc. ("LG USA") filed a motion to dismiss Plaintiffs' First Amended Complaint Class Action Complaint (the "FAC") on April 27, 2012. In its Motion to Dismiss, LG USA seeks an order dismissing the FAC in its entirety with prejudice.

Briefing on the Motion to Dismiss was completed on June 25, 2012. To date, the Court has not rendered a decision on the Motion.

In light of LG USA's pending Motion to Dismiss, which may resolve all or some of the claims in this action, the parties respectfully request that the initial conference currently scheduled for August 8, 2012 be postponed until after a decision on LG USA's motion to dismiss has been rendered.

The parties have conferred and respectfully submit the following proposed discovery schedule:

Rule 26(f) Conference: Within 30 days of the Court's decision on LG USA's Motion to Dismiss, if the FAC is allowed to proceed.

Discovery Plan: Within 14 days of the parties' Rule 26(f) conference.

DMEAST #15376435 v1

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Initial Disclosures: Within 14 days of the parties' Rule 26(f) conference.

Rule 16 Conference: At least 45 days after the Court's decision on LG USA's Motion, in accordance with the dates proposed above.

We are available to discuss this matter at the Court's convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. Tomlin', with a long horizontal flourish extending to the right.

Christopher N. Tomlin

CNT/dc